

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

TARA STEPHANI,

Plaintiff,

v.

Case No. 21-cv-458

JC SOLUTIONS, *et al.*,

Defendants.

PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND COSTS

COMES NOW Plaintiff, Tara Stephani, by and through her attorneys, Walcheske & Luzi, LLC, and pursuant to 29 U.S.C. § 216(b) and Civil L. R. 7, respectfully motions this Court for an award of attorneys' fees and costs on the grounds set forth below, in Plaintiff's supporting brief, and in the accompanying Declarations of Attorneys James A. Walcheske and Robert M. Mihelich.

1. Plaintiff's counsel has achieved substantial success for Plaintiff in this matter by obtaining judgment against Defendants and in favor of Plaintiff in the amount of \$46,407.21 plus an award of reasonable attorneys' fees and costs, thus making Plaintiff a "prevailing party" under the Fair Labor Standards Act and Wisconsin's Wage Payment and Collection Laws;

2. Plaintiff's counsel motions this Court for an award of attorneys' fees of \$23,145.00 and reimbursement for costs of \$744.74; and

3. As set forth in greater detail in Plaintiff's supporting brief, the requested award is based on and consistent with the rates of other attorneys in the community and is reasonable given Plaintiff's success in this matter, the complexity of the claims and defenses in this matter and, ultimately, the public interests advanced by Plaintiff's litigation.

WHEREFORE, Plaintiff respectfully requests that the Court award attorneys' fees and costs as set forth above.

Dated this 20th day of July, 2022

WALCHESKE & LUZI, LLC
Counsel for Plaintiff

s/ *James A. Walcheske*
James A. Walcheske, State Bar No. 1065635
Scott S. Luzi, State Bar No. 1067405

WALCHESKE & LUZI, LLC
235 N. Executive Drive, Suite 240
Brookfield, Wisconsin 53005
Telephone: (262) 780-1953
Fax: (262) 565-6469
Email: jwalcheske@walcheskeluzi.com
Email: sluzi@walcheskeluzi.com